



BOULT • CUMMINGS
CONNERS • BERRY PLC

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September 17, 2001

EXECUTIVE SECRETARY

David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

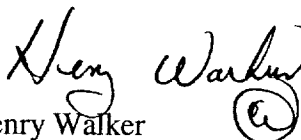
Re: *Docket to Determine the Compliance of BellSouth Telecommunications
Inc.'s Operations Support Systems with State and Federal Regulations*
Docket No: 01-00362

Dear David:

Attached is AT&T Communications of the South Central States, Inc, TCG MidSouth, Inc., and the Southeastern Competitive Carriers Association (collectively the "Intervenors") First Set of Discovery Requests and Requests for Production of Documents.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/cw

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 17th day of September, 2001.

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Nashville, TN 37201-3300

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AT&T Communications of the South Central States, Inc.
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Attorney General's Office
P.O. Box 20207
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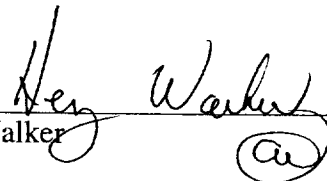
Hewlett Packard Company
C T Corporations System
530 Gay Street
Knoxville, TN 37902

KPMG Consulting, Inc.
Lexis Document Services Inc.
500 Church Street, 4th Floor
Nashville, TN 37219

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McLean, Virginia 22102

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Henry Walker

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)
Docket to Determine the)
Compliance of BellSouth)
Telecommunications, Inc.'s)
Operational Support Systems with)
State and Federal Regulations)

Docket No.: 01-00362

**AT&T COMMUNICATIONS OF THE SOUTHCENTRAL STATES, INC., TCG
MIDSOUTH, INC., AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION, FIRST SET OF INTERROGATORIES TO BELL SOUTH
TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG MidSouth, Inc., and the Southeastern Competitive Carriers Association serve upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the Interrogatories

that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.
6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with BellSouth.
7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such

original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.

9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

10. "You" or "yours" means BellSouth and any agents or employees thereof.

11. The "Georgia OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission ("GPSC") in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. ("KCI") on March 20, 2001.

12. The “Florida OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission (“FPSC”) in Docket Nos. 981834-TP and 960786-TL.
13. “Status Report” refers to any KCI Interim Status Reports.
14. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the Interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: For the Georgia and Florida OSS tests, please identify all individuals involved in the tasks listed below, and describe the nature and time period of each individual's involvement in that task. Please provide the information organized in response to the following subparts and indicate which individual is best able to provide information on the details of the topic referenced in the subpart.

- (a) Negotiations surrounding the initial and any subsequent engagements for third-party testing between BellSouth ("BellSouth") and KCI;
- (b) the drafting or revision of any and all fee arrangements or contracts for hire that reflect an agreement for performed by KCI, by version;
- (c) the development, review and/or revision of the Georgia and Florida OSS Tests Master Test Plans including any supplemental test plans, by version, including decisions regarding the scope of the Georgia and Florida OSS Tests;
- (d) the implementation of the Georgia and Florida OSS Test Master Test Plans including all supplemental test plans;
- (e) the collection or reporting of data or supporting information under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
- (f) for each test domain, the identification of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;

- (g) for each exception report, the resolution or closure of exceptions under the Georgia and Florida OSS Test Master Test Plans, including all supplemental test plans;
- (h) the drafting and revision of the Georgia OSS Test Master Test Plan Final Report and the Supplemental Test Plan Final Report.

ANSWER:

INTERROGATORY No. 3: Please identify the participants in each of the weekly conference calls referenced in the Georgia Status Reports.

ANSWER:

INTERROGATORY No. 4: Please identify all individuals who drafted or revised all plans or reports submitted to the GPSC during the course of the Georgia OSS Test and for each, identify the report drafted or revised.

ANSWER:

INTERROGATORY No. 5: Please identify all individuals who drafted or revised all documents, plans or reports submitted to the FPSC during the course of the Florida OSS Test (beginning with the creation of the Master Test Plan and all periods thereafter) and for each, identify the report drafted or revised.

ANSWER:

INTERROGATORY No. 6: Please describe the policies and procedures KCI employed in the Georgia and Florida OSS Tests, identify any input by BellSouth as to the policies and procedures and specify the ways in which these policies and procedures differ, if any, from Generally Accepted Auditing Principles and/or standards promulgated by the American Institute of Certified Public Accountants.

ANSWER:

INTERROGATORY No. 7: Please identify all of the differences between the procedures, testing, monitoring and reporting used in the Georgia OSS Test and the procedures used and being used in the Florida OSS test. Please explain how these differences relate to data reporting and test results.

ANSWER:

INTERROGATORY No. 8: Please identify all electronic, telephonic or other communication received from any third party, including CLECs, regarding exceptions,

conduct, scope, assumptions, problems, deficiencies, concerns, or any other issues related to the Georgia and Florida OSS Tests. For each communication, please describe how the third party communication was processed, to whom the information was disseminated, and any resulting action.

ANSWER:

INTERROGATORY No. 9: Please describe the process by which the Georgia and Florida OSS Test Master Test Plan was developed. Please identify and describe each revision to the Master Test Plan and for each describe the date of the revision, the basis for the revision, and the impact of the revision on the respective OSS Test.

ANSWER:

INTERROGATORY No. 10: Please identify and describe the standard, if any, for military testing used in designing the Georgia and Florida OSS Tests, including, but not limited to, any differences between the two tests.

ANSWER:

INTERROGATORY No. 11: The Georgia Master Test Report states at Page II-6 that “[i]n a military style test, a mindset of ‘test until you pass’ was generally adopted.” Please identify all of the tests in the Georgia OSS Test that deviated from military testing and, for each test, explain the basis for the deviation.

ANSWER:

INTERROGATORY No. 12: Please describe BellSouth's involvement in selecting sample sizes in the Georgia and Florida OSS Tests for each test by individual test or, if appropriate, by groups of tests, the methodology used by BellSouth in selecting sample sizes, and identify the individuals responsible for developing and implementing that methodology.

ANSWER:

INTERROGATORY No. 13: For the Georgia and Florida OSS Test, please identify each test for which sample size or methodology was changed during any retest and describe the basis for each change. For each change, please identify the individuals involved in determining that the change should be made, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 14: For the Georgia and Florida OSS Tests, please identify all exceptions for which further testing was conducted after issuance of the closure report and describe the nature and results of that testing.

ANSWER:

INTERROGATORY No. 15: For the Georgia and Florida OSS Tests, please identify all exceptions that were closed based upon proposed fixes.

ANSWER:

INTERROGATORY No. 16: Please identify all tests which were considered for inclusion in the Georgia and Florida OSS Tests. For each test in each state, please identify the basis upon which the decision to include or exclude the test was made. Please also identify all individuals involved in making the decision for each test and describe the standards they applied.

ANSWER:

INTERROGATORY No. 17: Please describe all parameters of each test bed account in the Georgia and Florida OSS Tests.

ANSWER:

INTERROGATORY No. 18: For the Georgia and Florida OSS Tests, please identify each test in which KCI acted as if it were a CLEC. For each of these tests, please specify: (a) whether BellSouth could identify test transactions from KCI from commercial transactions from CLECs; (b) the steps taken by BellSouth to make the OSS test "blind;" (c) any instances in which BellSouth provided different treatment to test transactions from KCI than it provided to similar commercial transactions from CLECs servicing Tennessee consumers; (d) the reason for providing different treatment to KCI test transaction; and (e) the person(s) responsible for initiating such different treatment.

ANSWER:

INTERROGATORY No. 19: Please describe the process by which volume testing for capacity management testing was conducted in the Georgia and Florida OSS Tests.

ANSWER:

INTERROGATORY No. 20: Please identify all order types that are designed to fall out of the mechanized order process in the Georgia and Florida OSS Tests. For each order type, describe the basis for the design choice.

ANSWER:

INTERROGATORY No. 21: In connection with the Georgia and Florida OSS Tests, please identify, by order type, the percent of manual orders BellSouth receives from the test CLEC.

ANSWER:

INTERROGATORY No. 22: Please describe the information that BellSouth provided to KCI or Hewlett Packard (“HP”) for purposes of constructing the TAG and EDI interfaces for the Georgia OSS Test and the extent to which such information was readily available to CLECs. Please also describe the extent of assistance that BellSouth provided to HP or KCI, and who provided such assistance.

ANSWER:

INTERROGATORY No. 23: Please describe all communications between BellSouth and HP in connection with the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 24: For the Georgia and Florida OSS Tests, please identify the types of directory listings tested for: (a) unbundled network element loop orders; and (b) loop/port orders.

ANSWER:

INTERROGATORY No. 25: Please provide the definition and meaning of the term “parity” as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 26: Please identify by test activity all BellSouth retail operations used for purposes of assessing parity in the Georgia and Florida OSS Tests.

ANSWER:

INTERROGATORY No. 27: Please provide the definition and meaning of the phrase “retail analog” as it is used in the Georgia and Florida OSS Tests and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 28: Please identify all CLEC operations that were part of the Georgia and Florida OSS tests for which BellSouth contends there is no retail analog for purposes of assessing parity and describe the basis for the contention.

ANSWER:

INTERROGATORY No. 29: In connection with the Georgia OSS Test, please provide the definition and meaning of the phrase “original source” as it is used on page 22 of the Flow-Through Evaluation Report.

ANSWER:

INTERROGATORY No. 30: In connection with the Georgia and Florida OSS Tests, were any data regarding CLECs’ use of BellSouth’s OSS analyzed and compared with any test results with actual CLEC results? If so, please describe such analysis and comparison, the individuals performing the analysis and comparison, and their conclusions. If not, please explain and provide the basis for the decision not to make reference to actual CLEC data and identify the individuals involved in making that decision.

ANSWER:

INTERROGATORY No. 31: Did BellSouth ever provide KCI data or information from the AT&T Georgia 1000 Test of BellSouth provision of unbundled network element platform (“UNE-P”)? If so, describe any use KCI made of that data or information.

ANSWER:

INTERROGATORY No. 32: Please explain why the Georgia OSS Test was terminated and identify the individuals involved in requesting, considering, and approving the termination of the Test.

ANSWER:

INTERROGATORY No. 33: Please identify and describe all exceptions, exception amendments, exception responses, and exception closures issued since the submission of the Georgia Final Report on March 20, 2001.

ANSWER:

INTERROGATORY No. 34: Please state and provide the data results for all orders classified as partially mechanized orders during the second retest of O&P Test 1-2-3 and O&P Test 1-3-3.

ANSWER:

INTERROGATORY No. 35: Describe in detail any errors in the BellSouth October 2000 Flow-Through Report provided to KMPG for validation in the Georgia and Florida Third-Party Tests that caused that report to be different from the official reports filed with the Georgia and Alabama Public Service Commissions.

ANSWER:

INTERROGATORY No. 36: From January 2001 to present, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the achieved flow through rate and the CLEC error excluded flow through rate, by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories::

- a) LNP;
- b) UNE;
- c) Business Resale;
- d) Residence Resale; and
- e) Total (i.e., UNE, Business Resale, and Residential Resale combined)

ANSWER:

INTERROGATORY No. 37: From January 2001 to present, for each individual state in BellSouth's region and for the BellSouth region in total, please identify the volume of LSRs (segregated by manual and electronic) and the volume of issued service orders by interface (i.e., LENS, TAG, EDI, and all interfaces) for the following categories::

- a. LNP;
- b. UNE;
- c. Business Resale;
- d. Residence Resale; and
- e. Total (i.e., UNE, Business Resale, and Residential Resale combined)

INTERROGATORY No. 38: For each month since January 2001, please provide BellSouth's monthly wholesale revenues (or billings) for each state in its nine state region (and its regional total) in each of the following areas: residential resale, business resale, unbundled network elements, and interconnection. Also, please describe BellSouth's understanding of the reasons causing any significant change (i.e., 15 percent or greater) in Tennessee from one month to another (e.g., May, 2001 to June, 2001) in any area during 2001.

ANSWER:

INTERROGATORY No. 39: Please describe the information that BellSouth disclosed to PWC regarding "all known matters contradicting the assertion and communications from regulatory agencies affecting the subject matter or the assertion that have been disclosed" to PWC.

ANSWER:

INTERROGATORY No. 40: Please describe BellSouth's current plans to replace existing OSS with different OSS solutions, including but not limited to the anticipated technology to be used, functionality, and implementation schedule.

ANSWER:

INTERROGATORY No. 41: Please identify each type of switch used by BellSouth in each state where BellSouth provides service. (For example: Lucent 5ESS, Nortel DMS XX, etc.) Also provide the numbers of each type of switch in each state.

ANSWER:

INTERROGATORY No. 42: Identify the capacities of RSIMMS and ENCORE at the time of volume testing in Georgia and at the present time. Describe how BellSouth calculated such capacities.

ANSWER:

INTERROGATORY No. 43: Beginning with January 1, 2001, provide the service order accuracy rate for CLEC orders for Tennessee and each other state in BellSouth's region. For the purpose of this interrogatory, "service order accuracy rate" is defined as the percentage of service orders for CLECs that were processed by BellSouth exactly as they were ordered or prepared by CLECs.

ANSWER:

INTERROGATORY No. 44: Identify the individual(s) who are responsible for: (a) developing BellSouth's plans for replacing existing OSS with different OSS solutions; (b) deciding whether and when to implement such plans.

ANSWER:

INTERROGATORY No. 45: Describe BellSouth's current plans to replace any of its existing OSS with any different OSS solutions, and identify the date of such plans.

ANSWER:

INTERROGATORY No. 46: Provide the monthly turn-over (retention) rates for BellSouth employees at each of its CLEC support centers (e.g., LCSC, CWINS, etc.).

ANSWER:

INTERROGATORY No. 47: Identify the individual(s) at BellSouth who are most knowledgeable about the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations. Such internal measures may include, but are not limited to, those external measures contained in any BellSouth's Service Quality Measurement Plan.

ANSWER:

INTERROGATORY No. 48: Identify: (a) those performance measures for which BellSouth contends there is sufficient commercial usage in Tennessee upon which the TRA can base its section 271 recommendation; (b) those performance measures for which BellSouth contends there is insufficient commercial usage in Tennessee, but will offer commercial usage from another specified state for the purposes of the TRA's section 271 recommendation; (c) those performance measures for which BellSouth contends there is insufficient commercial usage in Tennessee, but will offer regional commercial usage for the purposes of the TRA's section 271 recommendation.

ANSWER:

INTERROGATORY No. 49: At any time since January 2000, has BellSouth had any policies or practices to provide a higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance & repair, and billing) to CLEC service requests (e.g., resale, unbundled network elements) for customers in one or more states (e.g., Georgia, Florida) over similar service requests for customers from other states in the BellSouth region (e.g., Tennessee)? If so, please:

- A. Describe such policies and practices;
- B. State the purpose of such policies and practices; and
- C. Identify the person within BellSouth who was responsible for instituting such policies and practices.

ANSWER:

INTERROGATORY No. 50: At any time since January 2000, has BellSouth had any policies or practices to provide a higher priority or special handling in terms of any OSS function (pre-ordering, ordering, provisioning, maintenance & repair, and billing) to service requests (e.g., resale, unbundled network elements) for any particular CLEC (including any third party tester operating as a pseudo-CLEC) over similar service requests from other CLECs? If so, please:

- A. Describe such policies and practices;
- B State the purpose of such policies and practices; and
- C. Identify the person within BellSouth who was responsible for instituting such policies and practices.

ANSWER:

INTERROGATORY No. 51: Identify all of the internal measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations. Such internal measures may include, but are not limited to, those external measures contained in any BellSouth's Service Quality Measurement Plan. The work centers

and other organizational units would include, but are not limited to BellSouth's: (a) local carrier service centers; (b) residential service center; (c) business service center; (c) regional central office operations; (d) regional installation and maintenance operations; (e) regional engineering and construction operations; (f) work management centers; (g) network reliability center; (h) address/facility inventory group; (i) circuit provisioning group; (j) customer wholesale interconnection services (CWINS) center; (k) billing data centers.

ANSWER:

INTERROGATORY No. 52: Identify all of the internal reports that BellSouth utilizes to communicate and analyze the data generated by the internal performance measures identified in the preceding interrogatory.

ANSWER:

INTERROGATORY No. 53: Identify the amount of fees that BellSouth (and its affiliates) has paid PWC for professional services (including but not limited to attestations, consulting, financial audits), broken down by engagement, in the year 2000 and the year 2001 to date.

ANSWER:

INTERROGATORY No. 54: Describe the process by which BellSouth updates and maintains its OSS databases used to support pre-ordering functions. The description should include, but is not limited to,:

- A. the organization responsible for updating and maintaining such databases for each state;
- B. the extent to which such databases are segregated by state (or by regions within states);
- C. the extent to which such databases are maintained in separate computer hardware;
- D. the means by which BellSouth monitors or measures the timeliness of updating such databases and the accuracy of such databases.

ANSWER:

INTERROGATORY No. 55: Identify the OSS performance measures that relate to: (a) testing of advanced services; and (b) the resale of advance services.

ANSWER:

INTERROGATORY No. 56: State whether OSS testing should include the testing of advanced services resale? If no, explain how BellSouth intends to demonstrate compliance

with the D.C. Court of Appeals "ASCENT Decision" in the absence of any demonstration that its OSS are capable of making advanced services available for resale?

ANSWER:

Respectfully submitted,

By: Henry Walker (cw)
Henry Walker
Boult, Cummings, Conners & Berry, PLC
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(615) 252-2363
Counsel for Southeastern Competitive Carriers
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By: Sylvia Anderson (cw)
Sylvia E. Anderson
AT&T Communication of the South Central States
TCG MidSouth, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)		
Docket to Determine the)		
Compliance of BellSouth)		Docket No.: 01-00362
Telecommunications, Inc.'s)		
Operational Support Systems with)		
State and Federal Regulations)		

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC. AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION'S FIRST SET OF INTERROGATORIES TO HEWLETT
PACKARD COMPANY**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG
MidSouth, Inc., and The Southeastern Competitive Carriers Association serve upon
Hewlett Packard Company ("HP") the following written interrogatories to be answered
under oath by an officer or agent of HP on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of HP, its attorneys,
investigators, agents, employees, or other representatives of HP and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each
part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for
your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper
with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to
supplement your answer, setting forth any information within the scope of the

Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. “State all facts” or “state the factual basis” means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.

6. When used with reference to natural persons, the word “identify” or “identity” or the phrase “give the identity of” means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with HP.

7. When used with reference to a document, the word “identify” or “identity” or the phrase “give the identity of” means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author’s identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information

reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in Hewlett Packard Company's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of HP, and shall mean every copy of every document when such a copy is not an identical copy of an original.

9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

10. "You" or "yours" means HP and any agents or employees thereof.

11. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. (“KCI”) on March 20, 2001.

12. “Status Report” refers to any KCI Interim Status Reports.

13. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the

claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the interrogatory with which that person assisted.

ANSWER:

✱

INTERROGATORY No. 2: Please identify, and describe the nature of the involvement of, all individuals who were substantially involved in with the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 3: Please describe fully HP's role in the Georgia OSS Test and identify the individuals from whom HP receives direction, the individuals to whom HP reports, and the individuals to whom HP directs questions, including, but not limited to, questions about the scope of HP's role.

ANSWER:

INTERROGATORY No. 4: Identify and describe any limitations or restrictions imposed upon HP by BellSouth (directly or indirectly through KPMG) with respect to the testing BellSouth's operational support systems in Georgia.

ANSWER:

INTERROGATORY No. 5: Please describe the compensation arrangement between BellSouth or KPMG and HP, including, but not limited to, base compensation, bonuses or any other compensation related to the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 6: Please identify all of the differences between the procedures HP has used and is using in the Georgia OSS Test and the procedures HP has used and/or is using in other states in which it has or is participating in a review or test of a Regional Bell Operating Company's Operational Support Systems. Please explain how these differences relate to data reporting and test results.

ANSWER:

INTERROGATORY No. 7: Please describe HP's involvement in the development of the Georgia OSS Test Master Test Plan and the process by which that plan was developed. Please identify and describe each revision to the Master Test Plan and for

each describe the date of the revision, the basis for the revision, and the impact of the revision on the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 8: Please identify all tests which were considered for inclusion in the Georgia OSS Test. For each test that was considered but ultimately excluded, please identify who made the decision to exclude the test and explain the basis for that decision.

ANSWER:

INTERROGATORY No. 9: With respect to the volume testing of BellSouth's OSS in Georgia, please: (a) describe HP's role in such volume testing; (b) identify any requirements that KPMG or BellSouth established for the successful completion of the volumes testing; (c) describe any problems encountered during the volume testing and how such problems were resolved..

ANSWER:

INTERROGATORY No. 10: Please describe any communication between or among BellSouth, HP, or KCI regarding the definition of “invalidating the test” as mentioned in the May 22, 2000 e-mail from Parag Doshi to Whit Matteson regarding BellSouth Volume on 5/22/00.

ANSWER:

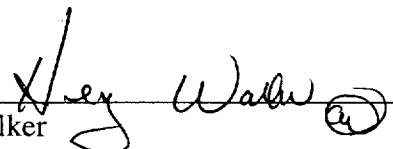
INTERROGATORY No. 11: Please identify the information available to HP for purposes of constructing the TAG and EDI interfaces, and state its understanding as to whether such information was available to CLECs. Did HP rely solely on this information or did it receive additional assistance? If HP received assistance, please identify the source and extent of the assistance.

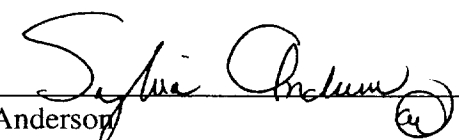
ANSWER:

INTERROGATORY No. 12: With respect to the FTP process used in connection with Billing Data files mentioned in the November 10, 1999 e-mail from Don Petry to Whit Matteson and Gary England, please: (a) describe the FTP process; (b) explain why the FTP process was implemented; (c) identify the person(s) that caused the FTP process to be implemented; and (d) if the FTP process was discontinued, state when it was discontinued and explain the reasons why it was discontinued.

ANSWER:

Respectfully submitted,

By: 
Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Stret, Suite 1600
Nashville, Tennessee 37219
(615) 252-2363
Counsel for Southeastern Competitive Carriers
Association, Inc.

By: 
Sylvia E. Anderson
AT&T Communication of the South Central States
TCG MidSouth, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)
Docket to Determine the)
Compliance of BellSouth)
Telecommunications, Inc.'s)
Operational Support Systems with)
State and Federal Regulations)

Docket No.: 01-00362

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC. AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION'S FIRST SET OF INTERROGATORIES TO ERNST & YOUNG**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG
MidSouth, Inc., and The Southeastern Competitive Carriers Association serve upon Ernst
& Young ("E&Y") the following written interrogatories to be answered under oath by an
officer or agent of E&Y on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of E&Y, its attorneys, investigators, agents, employees, or other representatives of E&Y and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the

Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.
6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with E&Y.
7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information

reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular

Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in E&Y's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of E&Y, and shall mean every copy of every document when such a copy is not an identical copy of an original.

9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

10. "You" or "yours" means E&Y and any agents or employees thereof.

11. The "Georgia OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission ("GPSC") in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. ("KCI") on March 20, 2001.
12. "Status Report" refers to any KCI Interim Status Reports.
13. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was "prepared in anticipation of litigation." Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the

claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: Identify the individual(s) who is most knowledgeable with the drafting of a master test plan for the testing BellSouth's operational support systems in Georgia.

ANSWER:

INTERROGATORY No. 3: Identify and describe E&Y's roles and responsibilities in drafting a master test plan for the testing BellSouth's operational support systems in Georgia.

ANSWER:

INTERROGATORY No. 4: Identify and describe BellSouth's interaction with E&Y regarding the drafting of a master test plan for the testing BellSouth's operational support systems in Georgia.

ANSWER:

INTERROGATORY No. 5: Identify and describe any limitations or restrictions imposed upon E&Y by BellSouth regarding the drafting of a master test plan for the testing BellSouth's operational support systems in Georgia.

ANSWER:

INTERROGATORY No. 6: Describe the Georgia Public Service Commission's interaction with E&Y, if any, regarding the drafting of a master test plan for the testing BellSouth's operational support systems in Georgia.

Respectfully submitted,

By: _____

Henry Walker

Boult, Cummings, Conners & Berry, PLC

414 Union Street, Suite 1600

Nashville, Tennessee 37219

(615) 252-2363

Counsel for Southeastern Competitive Carriers
Association, Inc.

By: _____

Sylvia E. Anderson

AT&T Communication of the South Central States

TCG MidSouth, Inc.

1200 Peachtree Street, N.E.

Suite 8100

Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)
Docket to Determine the)
Compliance of BellSouth)
Telecommunications, Inc.'s)
Operational Support Systems with)
State and Federal Regulations)

Docket No.: 01-00362

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC., AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION
FIRST SET OF INTERROGATORIES TO KPMG CONSULTING INC**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG MidSouth, Inc, and the Southeastern Competitive Carriers Association, serve upon KPMG Consulting, Inc. ("KPMG" or "KCI") the following written interrogatories to be answered under oath by an officer or agent of KCI on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of KCI, its attorneys, investigators, agents, employees, or other representatives of KCI and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the

Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.
6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with KCI.
7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all

other information reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in KCI's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of KCI, and shall mean every copy of every document when such a copy is not an identical copy of an original.
9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.
10. "You" or "yours" means KCI and any agents or employees thereof.

11. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. (“KCI”) on March 20, 2001.
12. The “Florida OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission (“FPSC”) in Docket Nos. 981834-TP and 960786-TL.
13. “Status Report” refers to any KCI Interim Status Reports.
14. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was

prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: Please identify all individuals involved in the tasks listed below, and describe the nature and time period of each individual’s involvement in that task. Please provide the information organized in response to the following subparts and indicate which individual is best able to provide information on the details of the topic referenced in the subpart.

- (a) Negotiations surrounding the initial engagement of KPMG by BellSouth Telecommunications, Inc. (“BellSouth”) for third-party testing of BellSouth's OSS and any subsequent engagement between BellSouth and KPMG;
- (b) the drafting or revision of any and all fee arrangements or contracts for hire that reflect an agreement for third party test work performed by KPMG, by version;

- (c) the development, review and/or revision of the Georgia and Florida OSS Test Master Test Plan or Supplemental Test Plan, by version, including decisions regarding the scope of these tests;
- (d) the implementation of the Georgia and Florida OSS Test Master Test Plan or Supplemental Test Plan;
- (e) the collection or reporting of data or supporting information under the Georgia and Florida OSS Test Master Test Plan or Supplemental Test Plan;
- ✱ (f) for each test domain, the identification of exceptions under the Georgia and Florida OSS Test Master Test Plan or Supplemental Test Plan;
- (g) for each exception report, the resolution or closure of exceptions under the Georgia and Florida OSS Test Master Test Plan or Supplemental Test Plan; and
- (h) the drafting and revision of the Georgia OSS Test Master Test Plan Final Report and the Supplemental Test Plan Final Report.

ANSWER:

INTERROGATORY No. 3: Please identify, and describe the nature of the involvement of, all individuals not previously identified in response to Interrogatory No. 2 who in any way assisted with the Georgia or Florida OSS Test or had any communication with BellSouth, Hewlett Packard, the GPSC, the FPSC, or PricewaterhouseCoopers, LLC regarding these tests.

ANSWER:

INTERROGATORY No. 4: Please describe fully KPMG's role in the Georgia and Florida OSS Test and identify the individuals from whom KPMG receives direction, the individuals to whom KPMG reports, and the individuals to whom KPMG directs questions, including, but not limited to, questions about the scope of KPMG's role.

ANSWER:

INTERROGATORY No. 5: Please describe the compensation arrangement between BellSouth and KPMG, including, but not limited to, base compensation, bonuses or any other compensation related to its master agreement with BellSouth, including but not limited to compensation for third party test work.

ANSWER:

INTERROGATORY No. 6: Regarding the Georgia OSS Test, please identify each meeting among or between BellSouth, KPMG, and/or representatives of the GPSC, whether or not the meeting was attended by others, and for each meeting, identify both the invited persons and the attendees, and describe the purpose of the meeting. Please indicate which of the meetings was a regularly scheduled meeting set by a published schedule. Please identify all documents referred to and all persons consulted to develop the response to this Interrogatory.

ANSWER:

INTERROGATORY No. 7: Regarding the Georgia OSS Test, please identify each telephone call among or between BellSouth, KPMG, and/or representatives of the GPSC, and for each call, identify the persons invited to participate and the participants, and describe the purpose of the call. Please indicate which of the calls was a regularly scheduled call set by a published schedule. Please identify all documents referred to and all persons consulted to develop the response to this Interrogatory.

ANSWER:

INTERROGATORY No. 8: Please identify the participants in each of the weekly conference calls referenced in Status Reports.

ANSWER:

INTERROGATORY No. 9: Please identify all individuals who drafted or revised all plans or reports submitted to the GPSC during the course of the Georgia OSS Test and for each identify the report drafted or revised.

ANSWER:

INTERROGATORY No. 10: Please describe the procedures KPMG employed in the Georgia and Florida OSS Tests and specify the ways in which these procedures differ, if any, from Generally Accepted Auditing Principles and/or standards promulgated by the American Institute of Certified Public Accountants.

ANSWER:

INTERROGATORY No. 11: Please identify all of the differences between the procedures KPMG has used and is using in the Georgia OSS Test and the procedures KPMG has used and/or is using in other states, including Florida, in which it has or is participating in a review or test of a Regional Bell Operating Company's OSS. Please explain how these differences relate to data reporting and test results.

ANSWER:

INTERROGATORY No. 12: Please identify all test data, test assumptions, workpapers, and/or work-in-progress received from any third-party, including but not limited to materials received from BellSouth, HP, the GPSC, and PricewaterhouseCoopers, LLC regarding the Georgia and Florida OSS Test. For each item: (a) state whether KPMG performed its own independent review or verification of the item or information, and describe the nature of the review or verification; (b) if no such independent review or verification was conducted, explain why; and (c) describe the manner in which the item or information was used by KPMG.

ANSWER:

INTERROGATORY No. 13: Please describe the process for reviewing Competitive Local Exchange Carrier ("CLEC") communications relating to the Georgia and Florida OSS Test, including, but not limited to, who at KPMG or BellSouth received the communications, to whom they were disseminated, the process for evaluating the communicated information, and the plan and process for responding.

ANSWER:

INTERROGATORY No. 14: Please identify all electronic, telephonic or other communication received from any third party, including CLECs, regarding exceptions, conduct, scope, assumptions, problems, deficiencies, concerns, or any other issues related to the Georgia and Florida OSS Test. For each communication, please describe how KPMG

processed the third party communication, to whom the information was disseminated, and any resulting action.

ANSWER:

INTERROGATORY No. 15: Please identify all states in which KPMG has or is participating in a review or test of an OSS and describe all testing, monitoring and reporting differences between the Georgia OSS Test and the review or testing of OSS KPMG has conducted or is conducting in other states, including Florida.

ANSWER:

INTERROGATORY No. 16: Please describe the process by which the Georgia and Florida OSS Test Master Test Plan was developed. Please identify and describe each revision to the Master Test Plan and for each describe the date of the revision, the basis for the revision, and the impact of the revision on the respective OSS Test.

ANSWER:

INTERROGATORY No. 17: Please provide the definition and meaning of the phrase “military style testing” as it is used in the Georgia OSS Test and explain how it relates to test results. Does this definition differ from the way the phrase “military style testing” is defined in tests of OSS in other states? Please specify and explain the basis for each difference.

ANSWER:

INTERROGATORY No. 18: Please identify and describe the standard, if any, for military testing used in designing the Georgia and Florida OSS Test.

ANSWER:

INTERROGATORY No. 19: The Master Test Report states at Page II-6 that “[i]n a military style test, a mindset of ‘test until you pass’ was generally adopted.” Please identify all of the tests in the Georgia OSS Test in which KPMG deviated from military testing and, for each test, explain the basis for the deviation.

ANSWER:

INTERROGATORY No. 20: Please describe the methodology used in the Georgia and Florida OSS Test to select sample sizes for each test by individual test or, if appropriate, by groups of tests and identify the individuals responsible for developing and implementing that methodology.

ANSWER:

INTERROGATORY No. 21: Please identify each test in the Georgia and Florida OSS Test for which sample size or methodology was changed during retest and describe the basis for each change. For each change, please identify the individuals involved in determining the change should be made, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 22: In the Georgia and Florida OSS Test, please identify all exceptions for which further testing was conducted after issuance of the closure report and describe the nature and results of that testing.

ANSWER:

INTERROGATORY No. 23: In the Georgia and Florida OSS Test, please identify all exceptions that were closed based upon proposed fixes. For each exception, please identify the individuals involved in determining the exception should be closed, their qualifications for

making that determination, the standards they applied, the criteria established for retest, and the basis upon which they accepted a proposed fix rather than requiring the fix to be implemented and tested.

ANSWER:

INTERROGATORY No. 24: Please identify all tests which were considered for inclusion in the Georgia and Florida OSS Test. For each test, please identify the basis upon which the decision to include or exclude the test was made. Please also identify all individuals involved in making the decision for each test and describe the standards they applied.

ANSWER:

INTERROGATORY No. 25: Please provide the definition and meaning of the phrase “statistically insignificant” as it is used in the Georgia OSS Test and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 26: In the Georgia OSS Test, for each set of test results in which KPMG determined that the findings were “statistically insignificant,” please identify the individuals involved in making that determination, their qualifications for making that

determination, the standard and/or methodology they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 27: Please provide the definition and meaning of the phrase “no adverse impact on competition” as it is used in the Georgia OSS Test and explain how it relates to test results.

ANSWER:

INTERROGATORY No. 28: In the Georgia OSS Test, for each set of test results in which KPMG made a determination of “no adverse impact on competition,” please identify the individuals involved in making that determination, their qualifications for making that determination, the standard and/or methodology they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 29: Please provide the definition and meaning of the phrase “satisfied” as it is used in the Georgia and Florida OSS Test and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 30: In the Georgia and Florida OSS Test, for each test for which KPMG made a determination of “satisfied,” please identify the individuals involved in making that determination, their qualifications for making that determination, the methodology and/or standard they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 31: In the Georgia and Florida OSS Test, please describe all parameters of each test bed account.

ANSWER:

INTERROGATORY No. 32: Please explain whether any test results, including but not limited to results from work done prior to September 9, 1999, were excluded from the Georgia OSS Test Final Report. If so, identify and describe the excluded data and for each item describe why it was excluded.

ANSWER:

INTERROGATORY No. 33: In the Georgia OSS Test, for each “draft exception” report that was withdrawn, please identify the individuals involved in making the withdrawal determination, their qualifications for making that determination, the standard they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 34: In the Georgia and Florida OSS Test, please identify each test in which KPMG acted as if it were a CLEC. For each of these tests, please specify whether KPMG was identifiable to BellSouth and describe KPMG’s process to insure it was treated like any other CLEC.

ANSWER:

INTERROGATORY No. 35: In the Georgia and Florida OSS Test, for each test where the test result is “satisfied” or an exception is closed based on KPMG’s “professional judgment,” please identify the individuals involved in making that determination, their qualifications for

making that determination, the standard they applied, and the factors that informed their decision.

ANSWER:

INTERROGATORY No. 36: In the Georgia and Florida OSS Test, please describe the process by which KPMG conducted volume testing for capacity management testing.

ANSWER:

INTERROGATORY No. 37: In the Georgia and Florida OSS Test, please describe the standard against which KPMG evaluated BellSouth's change management process and the basis for the choice of that standard.

ANSWER:

INTERROGATORY No. 38: Please describe any CLEC interviews conducted as part of the Georgia and Florida OSS Test, including but not limited to an identification of the CLECs interviewed and a description of the subjects discussed.

ANSWER:

INTERROGATORY No. 39: Please describe the information that KCI made available to Hewlett Packard ("HP") for purposes of constructing the TAG and EDI interfaces used in the

Georgia OSS Test. Did KCI provide assistance to HP in constructing these interfaces. If so, please identify the source and extent of the assistance.

ANSWER:

INTERROGATORY No. 40: Please identify the types of directory listings tested in the Georgia OSS Test for: (a) unbundled network element loop orders; and (b) loop/port orders.

ANSWER:

INTERROGATORY No. 41: Please provide the definition and meaning of the term “parity” as it is used in the Georgia and Florida OSS Test and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 42: Please identify by Georgia and Florida OSS Test activity all BellSouth retail operations used for purposes of assessing parity.

ANSWER:

INTERROGATORY No. 43: Please provide the definition and meaning of the phrase “retail analog” as it is used in the Georgia and Florida OSS Test and explain how it relates to data reporting and results.

ANSWER:

INTERROGATORY No. 44: Please identify all CLEC operations for which BellSouth contended to KCI that there is no retail analog for purposes of assessing parity and describe KCI's understanding of the basis for that contention.

ANSWER:

INTERROGATORY No. 45: Please identify all benchmarks established for the Georgia and Florida OSS Test and, for each, identify the individual or individuals who established the benchmark, describe the method by which the benchmark was set and any standards on which it is based, and describe any other factors supporting the benchmark.

ANSWER:

INTERROGATORY No. 46: The Flow-Through Evaluation Final Report in the Georgia OSS test refers on page 5 to a “summary of the interim results of our testing activities.” Identify and describe the additional flow-through analysis and reporting, if any, underway?

ANSWER:

INTERROGATORY No. 47: Please provide the definition and meaning of the phrase “original source” as it is used on page 22 of the Flow-Through Evaluation Report.

ANSWER:

INTERROGATORY No. 48: In the Georgia and Florida OSS test, did or will KCI analyze any data regarding CLECs’ use of BellSouth’s OSS and compare any test results with actual CLEC results? If so, please describe such analysis and comparison, the individuals performing the analysis and comparison, and their conclusions. If not, please explain and provide the basis for KPMG’s decision not to make reference to actual CLEC data and identify the individuals involved in making that decision.

ANSWER:

INTERROGATORY No. 49: Did KCI ever receive data or information from the AT&T Georgia 1000 Test of BellSouth provision of UNE-P? If so, please explain how that information was disseminated and describe any impact on the Georgia OSS Test.

ANSWER:

INTERROGATORY No. 50: In the Georgia and Florida OSS Test, for each test in which results were aggregated, please provide the basis for such aggregation and identify the

individuals involved in deciding that test results should be aggregated, their qualifications for making that decision, the standard they applied, and the factors they considered.

ANSWER:

INTERROGATORY No. 51: Please explain why the Georgia OSS Test was terminated and identify the individuals involved in requesting, considering, and approving the termination of the Test.

ANSWER:

INTERROGATORY No. 52: Does KPMG agree with GPSC's conclusion, contained in the March 5, 2001 letter from Leon Bowles of the GPSC to Brian Rutter of KPMG, that "additional testing in the areas where your evaluations has [sic] been completed or are near conclusion will produce either marginal or no additional benefit?" If so, please describe the basis for KPMG's agreement. If not, please describe the areas of your disagreement and the basis for each.

ANSWER:

INTERROGATORY No. 53: Please specify the basis for the conclusion that "inaccuracies in metrics reporting would not in and of themselves have a materially adverse impact on competition" contained in the March 20, 2001 letter from Michael Weeks of KPMG to Leon Bowles of the GPSC. Please also identify the individuals involved in reaching that

conclusion, their qualifications for reaching that conclusion, the standard they applied, and the factors they considered.

ANSWER:

INTERROGATORY No. 54: Is it KPMG's determination that the availability of GPSC monitoring through "performance measures and/or penalty plans" obviates any potential adverse impact on competition, as suggested in the March 20, 2001 letter from Michael Weeks of KPMG to Leon Bowles of the GPSC? If so, please specify the basis for this determination and identify the individuals involved in making this determination, their qualifications for making this determination, the standard they applied, and the factors they considered.

ANSWER:

INTERROGATORY No. 55: Please identify the "five active issues" contained in KPMG's Documentation Issues Log as reported in the Interim Status Report of January 26, 2001.

ANSWER:

INTERROGATORY No. 56: Please identify and describe all exceptions, exception amendments, exception responses, and exception closures issued since the submission of the Final Report on March 20, 2001.

ANSWER:

INTERROGATORY No. 57: Please identify and describe all pending exceptions, exception amendments, exception responses, and exception closures still outstanding for the Georgia OSS Test as of the date of your answer.

ANSWER:

INTERROGATORY No. 60: Please describe the mechanism KPMG used to set sample sizes to protect against Type II errors in the Georgia OSS test.

ANSWER:

INTERROGATORY No. 58: Please describe all steps that KPMG employed to: (a) ensure that its transaction-based testing was “blind” to BellSouth; (b) ascertain whether BellSouth provided any type of preferential treatment to orders that were being tested as compared to orders from CLECs for customers in other BellSouth states.

ANSWER:

INTERROGATORY No. 59: Please describe any instances in which KPMG identified practices through which BellSouth gave preferential treatment to: (a) orders originating from KPMG; or (b) orders for CLEC customers in Georgia and Florida as compared to CLEC customers in other BellSouth states.

ANSWER:

INTERROGATORY No. 60: Please identify all of the tests that would be impacted if BellSouth had established a practice in its Local Carrier Service Center of providing a higher priority to processing partially mechanized and manual orders; (a) from KPMG; or (b) for CLEC customers in Georgia and Florida (as compared to CLEC customers in other BellSouth states).

ANSWER:

Respectfully submitted,

By: Henry Walker
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By: Sylvia E. Anderson
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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)		
Docket to Determine the)		
Compliance of BellSouth)		Docket No.: 01-00362
Telecommunications, Inc.'s)		
Operational Support Systems with)		
State and Federal Regulations)		

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC. AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION'S FIRST SET OF INTERROGATORIES TO PRICE
WATERHOUSE COOPERS, LLP**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG MidSouth, Inc., and The Southeastern Competitive Carriers Association serve upon Price Waterhouse Coopers, LLP ("PWC") the following written interrogatories to be answered under oath by an officer or agent of PWC on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of PWC, its attorneys, investigators, agents, employees, or other representatives of PWC and/or its attorneys.
2. Where an Interrogatory calls for an answer which involves more than one part, each part of the answer should be clearly set out so it is understandable.
3. In the event the space provided on the form of Interrogatories is not sufficient for your answer to any of the Interrogatories, please attach a labeled, separate sheet of paper with the additional information.
4. These Interrogatories are intended as continuing Interrogatories, requiring you to supplement your answer, setting forth any information within the scope of the

Interrogatories that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original answer.

5. "State all facts" or "state the factual basis" means to set forth in writing and in detail every fact, opinion, assumption, belief, hypothesis, and theory, concerning or relating to the matter inquired about in the Interrogatory, whether these are matters of your own observation and actual knowledge, or are matters which you have become aware of through some other means or through some other person. It furthermore means to set forth in writing in detail how and when you came to observe or have actual knowledge of the matter and how and when you became aware of the matter through some other means or person. It also means to identify all such persons through whom you became aware of the matters.

6. When used with reference to natural persons, the word "identify" or "identity" or the phrase "give the identity of" means to state his or her full name, present or last-known address, present or last-known employer, present or last-known telephone number, occupation or profession, and the capacity in which he or she has ever been affiliated with PWC.

7. When used with reference to a document, the word "identify" or "identity" or the phrase "give the identity of" means to state the type of document to which the Interrogatory is addressed (i.e., correspondence, memoranda, notes, etc.); its title or other means of identification; its author's identity; its date; the identity of all recipients of the document (whether the document is addressed to such recipient or merely copied to such recipient); all dates and places of recording or filing with any court, commission, or public agency; the book and page number, or cause number, and all other information

reflecting recordation or filing; the present location and identity of the custodian of the original document; the present location and identity of all the persons having a copy of such document; and whether such original or copy of the document is presently in your possession or control, and, if it is not, what disposition was made of it. In the alternative, the document(s) in question may be attached to the answer to that particular Interrogatory.

8. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in PWC's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of PWC, and shall mean every copy of every document when such a copy is not an identical copy of an original.

9. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

10. "You" or "yours" means PWC and any agents or employees thereof.

11. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. (“KCI”) on March 20, 2001.
12. “Status Report” refers to any KCI Interim Status Reports.
13. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the

claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

INTERROGATORIES

INTERROGATORY No. 1: Please identify all persons who provided any information for purposes of answering these interrogatories and for each person identify the interrogatory with which that person assisted.

ANSWER:

INTERROGATORY No. 2: Describe PWC's policy regarding employee retention of electronic mail.

ANSWER:

INTERROGATORY No. 3: Describe PWC's capability to use computer back up systems (e.g., tapes, drives, etc.) to retrieve electronic mail that has been deleted by an employee.

ANSWER:

INTERROGATORY No. 4: Describe BellSouth's answers to each technical questions that PWC submitted to BellSouth pursuant to page 5 of BellSouth's Request for Proposal No. RFP-01-R-0017.

ANSWER:

INTERROGATORY No. 5: Identify each PWC employee that participated in the review of BellSouth's OSS, describe the scope of their responsibilities in conducting that review, and describe their professional qualifications.

ANSWER:

INTERROGATORY No. 6: Identify each BellSouth representative with whom PWC communicated regarding Issue Reference Nos. B.3, B.4, and B.5 identified in PWC's Pre-Order/Order Regionality Testing Issue Tracking matrix.

ANSWER:

INTERROGATORY No. 7: Describe the process by which PWC resolved Issue Reference Nos. B.3, B.4, and B.5 identified in PWC's Pre-Order/Order Regionality Testing Issue Tracking matrix.

ANSWER:

INTERROGATORY No. 8: Identify each of the BellSouth representatives that PWC worked with to resolve Issue Reference Nos. B.3, B.4, and B.5 identified in PWC's Pre-Order/Order Regionality Testing Issue Tracking matrix, and the role that each representative played in resolving these issues.

ANSWER:

INTERROGATORY No. 9: Describe the process by which PWC assured itself that BellSouth had actually resolved Issue Reference Nos. B.3, B.4, and B.5 identified in PWC's Pre-Order/Order Regionality Testing Issue Tracking matrix.

ANSWER:

INTERROGATORY No. 10: Identify each BellSouth employee that PWC interviewed, the subject matter and purpose of each respective interview, and the PWC representative that conducted the interview.

ANSWER:

INTERROGATORY No. 11: Identify and describe any limitations or restrictions imposed upon PWC by BellSouth regarding the regionality evaluation of BellSouth's operational support systems.

ANSWER:

INTERROGATORY No. 12: Identify the amount of fees that PWC has received from BellSouth (and its affiliates) for professional services (including but not limited to attestations, consulting, financial audits), broken down by engagement, in the year 2000 and the year 2001 to date.

ANSWER:

INTERROGATORY No. 13: Please indicate whether PWC made any communications to BellSouth under its contractual obligation to communicate to

BellSouth any illegal act, material error, or evidence that fraud may exist that came to PWC's attention. If so, please describe in detail each communication, BST's response, and the circumstances surrounding the subject of the communication.

ANSWER:

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)
Docket to Determine the)
Compliance of BellSouth)
Telecommunications, Inc.'s)
Operational Support Systems with)
State and Federal Regulations)

Docket No.: 01-00362

**AT&T COMMUNICATIONS OF THE SOUTHCENTRAL STATES, INC., TCG
MIDSOUTH, INC., THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
TO BELL SOUTH TELECOMMUNICATIONS, INC**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG MidSouth, Inc., and the Southeastern Competitive Carriers Association serve upon BellSouth Telecommunications, Inc. ("BellSouth") the following requests for the production of documents to be produced or made available on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.
2. These requests for production of documents are intended to be continuing requests, requiring you to supplement your production with documents within the scope of the requests that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original production.
3. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in

BellSouth's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.

4. "Person" shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.
5. "You" or "yours" means BellSouth and any agents or employees thereof.
6. The "Georgia OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission ("GPSC") in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report, Version 1.0 submitted by KPMG Consulting, Inc. ("KCI") on March 20, 2001.
7. The "Florida OSS Test" refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission ("FPSC") in Docket Nos. 981834-TP and 960786-TL.

8. "Status Report" refers to any KCI Interim Status Reports.
9. An objection of attorney-client privilege or work-product in response to a document request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was "prepared in anticipation of litigation." Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce all documents that reflect the negotiations surrounding BellSouth Telecommunications, Inc.'s ("BellSouth's") engagement of KCI for the Georgia and Florida OSS Tests.
2. Please produce all documents that relate to, reflect or represent all compensation paid to KCI under its master agreement, including but not limited to compensation paid for Georgia and Florida OSS testing.
3. Please produce any and all internal audits, change orders or work orders under the contract between KCI and BellSouth.
4. Please produce all drafts, revisions and edits of the Georgia Master Test Plan and all subparts respectively revised and agreed upon by KCI and BellSouth to include but not limited to revisions filed with the GPSC on 10/16/99, 12/15/99 and 3/21/2000.
5. Please produce all drafts, revisions, and edits of the Georgia Final and Supplemental Test Reports, including, but not limited to, related electronic mail, notes, memoranda and other correspondence.

6. Please produce all data provided by BellSouth to KCI or Hewlett Packard (“HP”) related to the Georgia and Florida OSS Tests, to include all revisions, changes, work papers, and drafts.
7. Please produce all correspondence and documents referring or relating to the Georgia and Florida OSS Tests, including, but not limited to, analysis or evaluation of information whether in letter, facsimile (fax), or electronic or other form, between or among any of the following entities: KCI, BellSouth, the GPSC, FPSC, and Hewlett Packard (“HP”) and CLECs.
8. Please produce all documents related to exception reports filed by KCI, including, but not limited to revisions, drafts, working papers and communications between BellSouth and KCI relating to any proposed exception report, in connection with the Georgia or Florida OSS Tests.
9. Please produce all withdrawn “draft exception” reports and related documents, to include but not limited to all comments sent or received from BellSouth and any subsequent communications, and all communications from BellSouth to KCI for the Georgia and Florida OSS Tests.
10. Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments

from the GPSC and FPSC on the exception or closure reports in the Georgia and Florida OSS Tests.

11. Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from HP on the exception or closure reports in the Georgia and Florida OSS Tests.
12. Please produce all notes taken by any participant in the weekly Georgia OSS and Florida OSS conference calls referenced in various Status Reports.
13. Please produce all documents detailing or related to any process for reviewing Competing Local Exchange Providers ("CLEC") communications relating to the Georgia and Florida OSS Tests, including, but not limited to, documents demonstrating who at KCI or BellSouth received the communications, to whom they were disseminated, the process for evaluating the communicated information, and the plan and process for responding.
14. Please produce any logs, including date, time, participants, agenda, and topics discussed, of all calls and meetings between KCI and BellSouth or between BellSouth and the GPSC and between BellSouth and the FPSC or among KCI, BellSouth and the GPSC or FPSC. Please provide copies of all notes taken by any participant in the calls identified.

15. Please produce all documents that refer or relate to KCI's evaluation of the accuracy of BellSouth's reports of flow through rates for BellSouth's own business and residential orders in the Georgia and Florida OSS Tests.
16. Please produce all documents that refer or relate to consideration of whether to evaluate the degree of parity between flow through rates for individual Competing Local Exchange Providers ("CLECs") and BellSouth in the Georgia and Florida OSS Tests.
17. Please produce all documents that refer or relate to evaluations of the adequacy of BellSouth's change management process in the Georgia and Florida OSS Tests.
18. Please produce all documents that refer or relate to retesting of BellSouth's proposed modifications to remedy Exception Nos. 9, 24 and 91 and any other exceptions closed on the basis of proposed fixes in the Georgia OSS Test.
19. Please produce all documents that refer or relate to the basis for determining the number of calls used during retests of billing exceptions in the Georgia OSS Test.
20. Please produce all documents related to any retesting or reconsideration of any exception after the issuance of the closure report on the exception in the Georgia and Florida OSS Tests.

21. Please produce all system outage logs for BellSouth systems necessary for the Georgia and Florida OSS Test.
22. Please produce any documents provided by BellSouth to KCI or HP for use in building the interfaces to place orders with BellSouth for the Georgia and Florida OSS Tests.
23. Please produce all documents related to the construction of the TAG and EDI interfaces in the Georgia and Florida OSS Tests.
24. Please produce all job aids, methods and procedures, and maintenance methods and procedures used to evaluate the DSL portion of the Supplemental Test Plan in the Georgia OSS Test.
25. Please produce all documents related to the determination of the P-value calculations in the Georgia OSS Test.
26. Please produce all documents referring or relating to recommendations for modification of the Georgia and Florida OSS Tests received from any entity.
27. Please produce all documents referring or relating to the scope of the Georgia and Florida OSS Tests as defined by the GPSC and the FPSC.

28. Please produce all documents related to KCI's determination that any exception was satisfied, not satisfied, or no determination was made in the Georgia OSS Test.
29. Please produce all documents that refer or relate to the standards or methodologies used to make the following determinations during the Georgia OSS Test: "satisfied," "not satisfied," "material adverse impact on competition," "no material adverse impact on competition," "statistically significant," and "not statistically significant."
30. Please produce all documents related to the decision to terminate the Georgia OSS Test.
31. Please produce retest transactions, analysis and evaluations on any open exceptions in the Georgia and Florida OSS Tests.
32. Please produce all documents relating to the design consideration and implementation of re-testing in the Georgia OSS Test, including, but not limited to, the volume to be tested and the product mix for retesting, for every transaction-based test.
33. Please produce all documents relating to the design and implementation of each test bed account in the Georgia and Florida OSS Tests.

34. Please produce all documents related to the design, methodology and implementation of data integrity testing of performance measures in the Georgia and Florida OSS Tests.
35. Please produce copies of any and all Test Cycle Logs included as part of the cycle report in the Master Test Plan in Georgia and Florida OSS Tests.
36. Please produce all documents that BellSouth's references in its responses to a test observation or test exception in Georgia and Florida that BellSouth provided to KPMG but which BellSouth asserts is proprietary. Such documents include, but are not limited, the documents referenced in BellSouth's response to Florida Exception Nos. 4, 6, 9, 34, 35, 37, 48, 65, 88, 94, 95, 106; and Florida Observation Nos. 25, 39, 63, 73, 75, 85, 86, 88, and 115.
37. Please produce all documents relating to the group or department that reviews work performed by the LCSC representatives to ensure the accuracy of the issued order based on the information submitted by the CLEC in the LSR. Include documents relating to its methods, procedures and work papers.
38. Please produce all correspondence, including electronic mail, between PriceWaterhouseCoopers ("PWC") and BellSouth regarding or related to PWC's evaluation of the regionality of BellSouth's OSS.

39. Please produce all information provided to PWC by BellSouth for PWC's evaluation of the regionality of BellSouth's OSS
40. Please produce all documents related to BellSouth providing different treatment to local service requests from one or more states (e.g., Florida and Georgia) over local service requests from another state (e.g., Tennessee).
41. Please produce all drafts (including those reflecting proposed revisions or comments by either party) of any reports exchanged between BellSouth and PWC regarding the regionality of BellSouth's OSS.
42. Please produce all work papers prepared by PriceWaterhouse Cooper as part of the examination of BellSouth OSS that are in BellSouth's possession.
43. Please produce all documents that relate to BellSouth's attempts to increase the capacity of its OSS production systems.
44. Please produce all state-specific performance measurement reports (e.g., "FCC format" and SQM) for each month since January, 2000 for Tennessee, Georgia, and Florida. Also produce all corresponding regional reports for the same period.

45. Please produce all correspondence referring or relating to the Georgia OSS Test, including electronic mail, between or among any of the following entities: KPMG, BellSouth, the GPSC, Hewlett Packard, and PWC.
46. Produce copies of all documents that relate to the performance of LCSC operations, including, but not limited to, "LCSC Weekly Operations Reports," "LCSC Daily Reports", or similiarly captioned reports from January 2000 to the present.
47. Produce copies of documents related to: (a) the development of BellSouth's plans to replace existing OSS with different OSS solutions; (b) its decision(s) whether and when to implement such plans.
48. Produce copies of each version of BellSouth plans to replace any of its existing OSS with any different OSS solutions since January 2000.
49. Produce copies of all documents and BellSouth approved "interview summaries" provided to KPMG consulting in connection with or related to the preparation and issuance of Observation 86 and Exception 88 in the Florida Third Party Test.
50. Produce copies of all documents associated with all "force models" used to project and administer staffing of the LCSC and CWINS centers.

51. From January 2001 to date, produce copies of the internal reports that BellSouth has utilized to communicate and analyze the data generated by the internal performance measures that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations.
52. Produce the performance measurement plan that BellSouth utilizes to collect and report internal performance data that BellSouth utilizes to monitor and manage the productivity and performance of its personnel, work centers, and other organizational units involved in pre-ordering, ordering, provisioning, maintenance & repair, or billing functions for BellSouth's wholesale operations or, to the extent that BellSouth does not segregate its wholesale operations and retail operations, for BellSouth's overall operations.
53. Since January 2000, produce any document that compares or analyzes BellSouth's internal performance data to evaluate the extent to which BellSouth's actual performance results for OSS functions (pre-ordering, ordering, provisioning, maintenance & repair, and billing) are similar in each state of its nine state region.
54. Please provide copies of any and all documents relied upon in responding to AT&T's First Interrogatories to BellSouth.

Respectfully submitted,

By: Henry Walker (CW)
Henry Walker
Boult, Cummings, Conners & Berry, PLC
414 Union Street, Suite 1600
Nashville, Tennessee 37219
(615) 252-2363
Counsel for Southeastern Competitive Carriers
Association, Inc.

By: Sylvia E. Anderson (CW)
Sylvia E. Anderson
AT&T Communication of the South Central States
TCG MidSouth, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)	
Docket to Determine the)	
Compliance of BellSouth)	Docket No.: 01-00362
Telecommunications, Inc.'s)	
Operational Support Systems with)	
State and Federal Regulations)	

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC. AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS
TO HEWLITT PACKARD COMPANY**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG
MidSouth, Inc., and the Southeastern Competitive Carriers Association serve upon
Hewlett Packard Company ("HP") the following Requests for Production of Documents
to be provided on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of HP, its attorneys,
investigators, agents, employees, or other representatives of HP and/or its attorneys.

2. "Documents" is to be construed in the broadest possible sense and means any tangible
thing, recording and reproduction, whether visual, auditory or digital in HP's possession,
control, or custody, including without limiting the generality of its meaning,
correspondence, pleadings, reports, depositions, personal memoranda, memoranda to
files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts,
photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or
otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio

tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of HP, and shall mean every copy of every document when such a copy is not an identical copy of an original.

3. Some of these requests seek documents relating to Operational Support Systems (“OSS”) testing in Georgia. Requests regarding the Georgia OSS Test seek documents created after May 20, 1999, the date of the Georgia Public Service Commission Order instituting the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia.

4. “Person” shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

5. “You” or “yours” means HP and any agents or employees thereof.

6. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KCI Consulting, Inc. (“KCI”) on March 20, 2001.

7. “Status Report” refers to any KCI Interim Status Reports.

8. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If

you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was "prepared in anticipation of litigation." Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

Request for Production of Documents

1. Please produce all work papers related to the Georgia third party test. These would include, but are not limited to work papers concerning volume testing, and the evaluation of wholesale and retail flow through rates.

2. Please produce all correspondence, including electronic mail, between HP and KPMG or BellSouth relating to the Georgia OSS test.
3. Please produce all documents KPMG or HP relied upon in building the interfaces for the Georgia OSS Test that were not publicly available to CLECs at the time the documents were provided to KPMG or HP and all documents that are not currently available to CLECs. Please identify, when producing the documents, which documents were not publicly available to CLECs at the time the documents were provided to KPMG or HP and which documents are not currently available to CLECs.
4. Please produce all job aids, methods and procedures, and maintenance methods and procedures that are not publicly available that were used to evaluate BellSouth for the DSL portion of the Supplemental Test Plan.
5. Please provide all documents including, but not limited to, correspondence and electronic mail the FTP process for obtaining billing data files.
6. Produce all documents relied upon in answering AT&T's First Set of Interrogatories.

Respectfully submitted,

By: Henry Walker
Henry Walker
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414 Union Street, Suite 1600
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(615) 252-2363
Counsel for Southeastern Competitive Carriers
Association, Inc.

By: Sylvia E. Anderson
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AT&T Communication of the South Central States
TCG MidSouth, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)
Docket to Determine the)
Compliance of BellSouth)
Telecommunications, Inc.'s)
Operational Support Systems with)
State and Federal Regulations)

Docket No.: 01-00362

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC., AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO KPMG
CONSULTING INC**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG MidSouth, Inc, and the Southeastern Competitive Carriers Association, serve upon KPMG Consulting, Inc. ("KPMG" or "KCI") the following requests for production of documents to be made available for inspection and copying in the offices of AT&T at 1200 Peachtree Street, Suite 8100, Atlanta, Georgia on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of KCI, its attorneys, investigators, agents, employees, or other representatives of KCI and/or its attorneys.
2. These requests for the production of documents are intended as continuing requests, requiring you to supplement your production that may be acquired by you, your agents, your attorneys, or representatives at any time following the date of your original production.

3. “Documents” is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in BellSouth’s possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of BellSouth, and shall mean every copy of every document when such a copy is not an identical copy of an original.
4. “You” or “yours” means KCI and any agents or employees thereof.
5. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KPMG Consulting, Inc. (“KCI”) on March 20, 2001.
6. The “Florida OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Florida, ordered by the Florida Public Service Commission (“FPSC”) in Docket Nos. 981834-TP and 960786-TL.
7. “Status Report” refers to any KCI Interim Status Reports.

8. An objection of attorney-client privilege or work-product in response to a document request is not an excuse for a complete failure to respond. If you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

REQUESTS

1. Please produce all documents that reflect the negotiations surrounding BellSouth’s engagement of KCI for the Georgia and Florida OSS Test.

2. Please produce all documents that reflect or represent all compensation received by KPMG from BellSouth under its master agreement, including but not limited to compensation for the Georgia and Florida OSS tests.
3. Please produce all documents that show or list any and all work performed by KCI for testing of BellSouth's OSS in Georgia and Florida.
4. Please produce any and all internal audits, change orders or work orders for all work performed by KPMG for BellSouth in the Georgia OSS Test.
5. Please produce all drafts, revisions and edits of the Georgia and Florida Master Test Plan and all subparts respectively revised and agreed upon by KPMG and BellSouth to include but not limited to revisions filed with the GPSC on 10/16/99, 12/15/99 and 3/21/2000.
6. Please produce all drafts, revisions, and edits of the Final and Supplemental Test Reports in the Georgia OSS Test, including, but not limited to, related electronic mail, notes, memoranda and other correspondence.
7. Please produce all data collected by KPMG for the Georgia and Florida OSS Test, to include all revisions, changes, work papers and drafts.

8. Please produce all correspondence referring or relating to the Georgia or Florida OSS Test, including electronic mail, between or among any of the following entities: KPMG, BellSouth, the GPSC, the FPSC, Hewlett Packard (“HP”), and PricewaterhouseCoopers, LLC.
9. Please produce all workpapers created by KPMG during the Georgia and Florida OSS Test.
10. Please produce all documents reflecting or referring to any analysis or evaluation of any information, material, drafts, documents, and/or data received from HP regarding the Georgia OSS Test.
11. Please produce all documents, materials, testing results, evaluations, and analyses received by KPMG and defined as part of the “work-in-progress” that had been performed prior to September 9, 1999, as referenced on page I-2 of the Supplemental Test Plan Final Report filed March 20, 2001 regarding the Georgia OSS Test.
12. Please produce all documents reflecting or referring to any analysis or evaluation of any information, material, drafts, documents, and/or data received from BellSouth for the Georgia and Florida OSS Test.
13. Please produce all drafts and revisions of all interim Status Reports filed by KPMG during the Georgia and Florida OSS Test.

14. Please produce all drafts and revisions of KPMG's Flow-Through Evaluations for the Georgia OSS Test.
15. Please produce all documents related to flow-through replication testing or retesting in the Georgia OSS Test.
16. Please produce all revisions, drafts and working papers related to exception reports filed by KPMG in the Georgia and Florida OSS Test, to include, but not limited to, all comments sent or received from KPMG to BellSouth and any subsequent communications, and all communications from BellSouth to KPMG on any proposed exception reports.
17. Please produce all withdrawn "draft exception" reports and related documents in the Georgia and Florida OSS Test, to include but not limited to all comments sent or received from KPMG to BellSouth and any subsequent communications, and all communications from BellSouth to KPMG.
18. Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from the GPSC or FPSC on the exception or closure reports in the Georgia and Florida OSS Tests respectively.

19. Please produce all documents, including but not limited to correspondence, electronic mail, and notes of telephone calls referring to, relating to, or constituting comments from HP on the exception or closure reports in the Georgia OSS Test.
20. Please produce all notes taken by any participant in the weekly conference calls referenced in various Status Reports in the Georgia and Florida OSS Test.
21. Please produce a log, including date, time, participants, agenda, and topics discussed, of all calls between KPMG and BellSouth or between KPMG and the GPSC/FPSC or among KPMG, BellSouth and the GPSC/FPSC regarding the Georgia or Florida OSS Test. Please provide copies of all notes taken by any participant in the calls identified.
22. Please produce a log, including date, time, participants, agenda, and topics discussed, of all meetings between KPMG and BellSouth or between KPMG and the GPSC/FPSC or among KPMG, BellSouth and the GPSC/FPSC regarding the Georgia or Florida OSS Test. Please provide copies of all notes taken by any participant in the meetings identified.
23. Please produce all Issue Reports authored by KPMG employees regarding the Georgia and Florida OSS Test.
24. Please produce all documents that describe the process by which KPMG conducted volume testing in the Georgia and Florida OSS Test.

25. Please produce all documents that refer or relate to KPMG's evaluation of the accuracy of BellSouth's reports of flow through rates for BellSouth's own business and residential orders.
26. Please produce all documents that refer or relate to consideration of whether to evaluate the degree of parity between flow through rates for individual competing local exchange carriers ("CLECs") and BellSouth.
27. Please produce all documents that refer or relate to evaluations of the adequacy of BellSouth's change management process.
28. Please produce all documents that refer or relate to any interviews of CLECs, including but not limited to decisions regarding conduct of interviews and summaries or transcripts of the interviews.
29. Please produce closure reports, if any, for Exception Nos. 16, 21, 26, 38, 47, 68, 76, 77, 78, 79, 86, 89, 93, 95, 99, 103, 104, 108, 115-119, 122, 124, 125, 126, 128-129, and 131-136 in the Georgia OSS Test.
30. Please produce all documents that refer or relate to retesting of BellSouth's proposed modifications to remedy Exception Nos. 9, 24 and 91 and any other exceptions closed on the basis of proposed fixes in the Georgia OSS Test.

31. Please produce all documents that refer or relate to the basis for determining the number of calls used during retests of billing exceptions in the Georgia OSS Test.
32. Please produce all documents related to any retesting or reconsideration of any exception after the issuance of the closure report on the exception in the Georgia OSS Test.
33. Please produce all system outage logs for BellSouth systems necessary for the Georgia OSS Test.
34. Please produce all documents related to building the interfaces to place orders with BellSouth for the Georgia OSS Test.
35. Please produce all documents related to the construction of the TAG and EDI interfaces used in the Georgia OSS Test.
36. Please produce all job aids, methods and procedures, and maintenance methods and procedures used to evaluate BellSouth for the DSL portion of the Supplemental Test Plan in the Georgia OSS Test.
37. Please produce all documents related to the determination of the P-value calculations in the Georgia and Florida OSS Test.

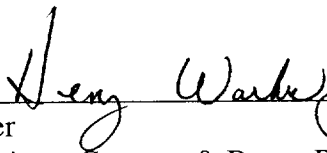

38. Please produce all documents referring or relating to recommendations for modification of the Georgia or Florida OSS Test received from any entity.
39. Please produce all documents referring or relating to the scope of the Georgia OSS Test as defined by the GPSC.
40. Please produce all documents related to KPMG's determination that any exception was satisfied, not satisfied, or no determination was made in the Georgia or Florida OSS Test.
41. Please produce all documents that refer or relate to the standards or methodologies used to make the following determinations during the Georgia and Florida OSS Test: "satisfied," "not satisfied," "material adverse impact on competition," "no material adverse impact on competition," "statistically significant," and "not statistically significant."
42. Please produce KPMG's Documentation Issues Log, all updates and revisions, and all documents that refer or relate to it in the Georgia OSS Test.
43. Please produce all information related to the AT&T Georgia 1000 Test of Bellsouth's provision of UNE-P.

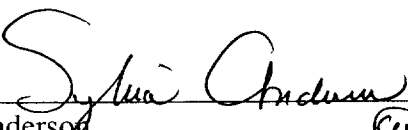

44. Please produce all documents related to the decision to terminate the Georgia OSS Test.
45. Please produce retest transactions, analysis and evaluations on any open exceptions in the Georgia and Florida OSS Test.
46. Please produce all documents relating to the design and implementation of retesting in the Georgia and Florida OSS Test, including, but not limited to, the volume to be tested and the product mix for retesting, for every transaction-based test.
47. Please produce all documents related to the methodology and implementation of data integrity testing of performance measures in the Georgia and Florida OSS Test.
48. Please produce all documents regarding the exception reports that remain open from the Georgia and Florida OSS Test.
49. Please produce all drafts of the Master Test Report from the Georgia and Florida OSS Test.
50. Please produce all documents regarding the differences between the New York, Florida, and Georgia OSS tests, as mentioned in (a) page 131 of the deposition of Mike Weeks dated May 4, 2001, and (b) pages 53, 174 of the deposition of David Frey dated May 4, 2001

51. Please produce all documents regarding Middle Volume Testing, including BellSouth's existing order process volumes, CLEC-submitted forecast information, and BellSouth's forecasting information, as mention in pages 63-64 of the deposition of David Frey dated May 4, 2001.
52. Please produce all documents regarding the significance of RSIMMS on server speed, as mention in pages 99-108 of the deposition of David Frey dated May 4, 2001.
53. Please produce all documents regarding CLEC problems with Change Management, as mentioned in page 36 of the deposition of Lawrence Freundlich dated May 3, 2001.
54. Please produce all documents regarding the construction of the systems that KPMG created to conduct the Georgia OSS test, as mentioned in pages 30-31 of the deposition of Terry Trudgian dated May 3, 2001.
55. Please produce all documents regarding written guidelines for handling issues or items raised by CLECs, as mentioned in page 63 of the deposition of Terry Trudgian dated May 3, 2001.
56. Please produce all documents regarding problems in BellSouth business rules specifications for the transfer of files, as mentioned in page 76 of the deposition of Terry Trudgian dated May 3, 2001.

57. Please produce all documents relating to or relied upon in answering AT&T's First Set of Interrogatories to KPMG Consulting, Inc.

Respectfully submitted,

By: Henry Walker  
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Counsel for Southeastern Competitive Carriers
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By: Sylvia E. Anderson  
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TCG MidSouth, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)	
Docket to Determine the)	
Compliance of BellSouth)	Docket No.: 01-00362
Telecommunications, Inc.'s)	
Operational Support Systems with)	
State and Federal Regulations)	

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC. AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS
TO ERNST & YOUNG**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG
MidSouth, Inc., and the Southeastern Competitive Carriers Association serve upon Ernst
& Young ("E&Y") the following Requests for Production of Documents to be provided on
or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of E&Y, its attorneys,
investigators, agents, employees, or other representatives of E&Y and/or its attorneys.

2. "Documents" is to be construed in the broadest possible sense and means any tangible
thing, recording and reproduction, whether visual, auditory or digital in E&Y's
possession, control, or custody, including without limiting the generality of its meaning,
correspondence, pleadings, reports, depositions, personal memoranda, memoranda to
files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts,
photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or
otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio

tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of E&Y, and shall mean every copy of every document when such a copy is not an identical copy of an original.

3. Some of these requests seek documents relating to Operational Support Systems (“OSS”) testing in Georgia. Requests regarding the Georgia OSS Test seek documents created after May 20, 1999, the date of the Georgia Public Service Commission Order instituting the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia.

4. “Person” shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.

5. “You” or “yours” means E&Y and any agents or employees thereof.

6. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KCI Consulting, Inc. (“KCI”) on March 20, 2001.

7. “Status Report” refers to any KCI Interim Status Reports.

8. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If

you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

Request for Production of Documents

1. Produce all correspondence between E&Y and BellSouth, or E&Y and the Georgia Public Service Commission, regarding the drafting of a master test plan for the testing BellSouth's operational support systems in Georgia.

2. Produce all documents (including work papers, drafts, meeting notes, etc.) regarding E&Y's drafting of a master test plan for the testing BellSouth's operational support systems in Georgia.
3. Produce all documents relied upon in answering AT&T's First Set of Interrogatories.

Respectfully submitted,

By: Henry Walker
Henry Walker
Boult, Cummings, Conners & Berry, PLC
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(615) 252-2363
Counsel for Southeastern Competitive Carriers
Association, Inc.

By: Sylvia E. Anderson
Sylvia E. Anderson
AT&T Communication of the South Central States
TCG MidSouth, Inc.
1200 Peachtree Street, N.E.
Suite 8100
Atlanta, GA 30309

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In re:)	
Docket to Determine the)	
Compliance of BellSouth)	Docket No.: 01-00362
Telecommunications, Inc.'s)	
Operational Support Systems with)	
State and Federal Regulations)	

**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC., TCG
MIDSOUTH, INC. AND THE SOUTHEASTERN COMPETITIVE CARRIERS
ASSOCIATION'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS
TO PRICE WATERHOUSE COOPERS, LLP**

AT&T Communications of the South Central States, Inc. ("AT&T"), TCG MidSouth, Inc., and the Southeastern Competitive Carriers Association serve upon price Waterhouse Coopers ("PWC") the following Requests for Production of Documents to be provided on or before October 12, 2001.

INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of PWC, its attorneys, investigators, agents, employees, or other representatives of PWC and/or its attorneys.

2. "Documents" is to be construed in the broadest possible sense and means any tangible thing, recording and reproduction, whether visual, auditory or digital in PWC's possession, control, or custody, including without limiting the generality of its meaning, correspondence, pleadings, reports, depositions, personal memoranda, memoranda to files, inter-office memoranda, intra-office memoranda, drawings, prints, graphs, charts, photographs, phonographs, notes, studies, valuations, analyses, reports (whether expert or otherwise), reviews, working papers, books, notes, telegrams, pamphlets, video or audio

tapes, voice recordings, computer tapes, printouts or cards, microfilms, microfiches, and any papers or items on which words have been written, printed, typed, or otherwise affixed, and shall mean a copy when the original is not in the possession, control, or custody of PWC, and shall mean every copy of every document when such a copy is not an identical copy of an original.

3. Some of these requests seek documents relating to Operational Support Systems (“OSS”) testing in Georgia. Requests regarding the Georgia OSS Test seek documents created after May 20, 1999, the date of the Georgia Public Service Commission Order instituting the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia.
4. “Person” shall mean and is defined as any natural person, proprietorship, association, partnership, corporation or any business entity, to include in the singular as well as the plural.
5. “You” or “yours” means PWC and any agents or employees thereof.
6. The “Georgia OSS Test” refers to the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia, ordered by the Georgia Public Service Commission (“GPSC”) in Docket No. 8354-U and summarized in the BellSouth Telecommunications, Inc. OSS Evaluation – Georgia Master Test Plan and Supplemental Test Plan Final Report Version 1.0 submitted by KCI Consulting, Inc. (“KCI”) on March 20, 2001.
7. “Status Report” refers to any KCI Interim Status Reports.
8. An objection of attorney-client privilege or work-product in response to an Interrogatory or Document Request is not an excuse for a complete failure to respond. If

you have such an objection, you are instructed to state fully the grounds for such objections, specifying, in the case of attorney-client privilege: (1) what type of communication is involved (letter, oral communication, memorandum, etc.), (2) the identities of all persons who are or were ever privy to the contents of such communications, (3) the general subject matter of the communication, (4) the date of and place where the communication was made, and (5) the general nature of the subject matter of the legal advice that was being sought or rendered, during the course of which such communication took place; and in the case of work-product privilege: (1) the identity of the attorney or person acting at the request or counsel who developed the work-product, (2) what the form of the work product is (letter, memorandum, etc.), (3) the identity of all persons who ever have been privy to the contents of such work-product, (4) the date it was prepared, (5) what litigation it was prepared in anticipation of, and (6) the basis for your contention that it was “prepared in anticipation of litigation.” Where such a privilege is asserted as to any document, you are instructed to prepare and submit to this defendant a list of all such documents together with the information supporting the claim of privilege and the identity of all such documents should be included as a part of your response to the requests for production of documents.

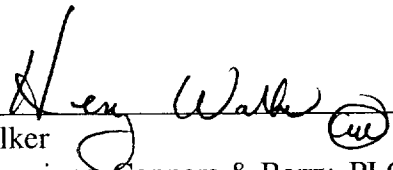
Request for Production of Documents

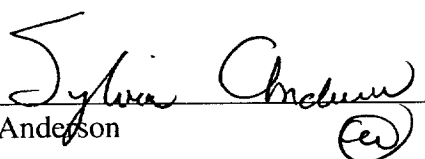
1. Produce all documents, including work papers, interview/meeting notes, related to PWC's attestation dated May 3, 2001.

2. Produce all documents, including work papers, interview/meeting notes, related to PWC's supplemental report regarding BellSouth's DOE and SONGS systems.
3. Produce all correspondence (e.g., electronic mail, deleted electronic mail retrievable for computer back up systems, letters, facsimiles) between PWC and BellSouth concerning PWC's review of BellSouth's OSS.
4. Produce all documents, including meeting notes, related to the conference call between BellSouth and PWC on or about March 14, 2001 referenced on page 5 of BellSouth's Request for Proposal No. RFP-01-R-0017.
5. Produce all documents related to Issue Reference Nos. B.3, B.4, and B.5 in PWC's Pre-Order/Order Regionality Testing Issue Tracking matrix.
6. Produce all documents referenced in the PWC Comments section for Issue Reference Nos. B.3, B.4, and B.5 in PWC's Pre-Order/Order Regionality Testing Issue Tracking matrix. These documents should include, but are not limited to the process change posting in each resale work area, the "iPage" sent by Dee Freeman-Butler to all her direct reports, and the email sent to LCSC executives to LCSC staff.

7. Produce all documents through which BellSouth disclosed to PWC regarding "all known matters contradicting the assertion and communications from regulatory agencies affecting the subject matter or the assertion."
8. Produce all documents related to any communications between PWC and BellSouth pursuant to its contractual obligation to report any illegal act, material error, or evidence that fraud may exist that came to PWC's attention.
9. Produce all documents relied upon in answering AT&T's First Set of Interrogatories.

Respectfully submitted,

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